

**UNITED STATES DISTRICT COURT
DISTRICT OF MAINE**

UNITED STATES OF AMERICA

v.

NATHAN LIBBY

)
)
)
)
)

Magistrate No. 2:21-mj-17-JHR

JOINT MOTION TO EXCLUDE TIME UNDER THE SPEEDY TRIAL ACT

The United States of America and Nathan Libby, through their respective undersigned counsel, hereby move that the Court enter an order under the Speedy Trial Act, 18 U.S.C. § 3161(h)(7), excluding the time that elapses between April 11, 2021 and May 11, 2021. In support of this Motion, the parties state the following:

The defendant was arrested on January 29, 2021 and first appeared in this case on February 1, 2021 and was ordered released on bail. In the absence of a speedy trial exclusion, the government would be required to present this case to a grand jury on or before April 11, 2021. The parties wish to have an additional period of approximately 30 days to continue to negotiate a pre-charge resolution of this case. Defense counsel represents that the defendant is aware of his Speedy Trial Act rights and has authorized counsel to seek the extension requested by this joint motion. By the signature of defense counsel below, the defendant hereby waives his rights under the Speedy Trial Act to have this matter presented to the grand jury within 30 days of his initial appearance and defendant expressly consents to the exclusion of time as requested herein.

The interest of justice to be served by the requested exclusion of time outweigh the interest of the defendant and the public in a speedy trial because the charges herein are very

serious and the potential to resolve the case by agreement would promote a speedy and certain outcome of the case.

WHEREFORE, the parties respectfully request that the Court enter an Order excluding the period of time between April 11, 2021 and May 11, 2021 from calculation under the provisions of the Speedy Trial Act.

Dated: 3/26/2021

/s/ Daniel J. Perry
Daniel J. Perry
Assistant U.S. Attorney

Dated: 3/26/2021

/s/ Grainne Dunne
Grainne Dunne
Attorney for Defendant

CERTIFICATE OF SERVICE

I certify that on March 26, 2021, I filed the foregoing Motion using the Court's CM/ECF system, which will cause a copy to be sent to all counsel of record.

/s/Daniel J. Perry
Assistant U.S. Attorney